

UNITED STATES
SECURITIES AND EXCHANGE COMMISSION

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DIVISION OF
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May 20, 2015

Via ECF

Honorable Valerie Caproni
United States District Judge
United States Courthouse
40 Foley Square
New York, New York 10007

Re: **SEC v. Revelation Capital Management, Ltd, et al, 14 Civ. 0645 (VEC)**

Dear Judge Caproni:

We respectfully submit this letter in the above-referenced action pursuant to Your Honor's Individual Practices to request a slight modification of the interim dates set for the completion of fact discovery and the pre-trial conference in this case. Defendants Revelation Capital Management, Ltd. and Christopher P.C. Kuchanny join in this request.

The parties are cognizant of the Court's admonition that you would not grant a further extension of the discovery deadline and, accordingly, we do not seek authorization to extend discovery beyond the present July 22, 2015 deadline for the completion of expert discovery. Due to some unavoidable delays in obtaining documents and testimony from third parties located in Canada, however, we jointly request Your Honor's permission to continue with fact discovery beyond that current deadline of June 4, 2015 within the period presently exclusively allocated to expert discovery. The parties propose to conduct both fact and expert discovery simultaneously and conclude all discovery on or before July 22, 2015. Thus, this adjustment would not have any adverse impact on the existing schedule.

The parties have worked diligently to complete fact discovery by the current deadline. Following the Court's issuance of the requested Letters Rogatory ("Requests"), we engaged in extensive negotiations with counsel for the individuals and entities towards which the Requests are directed to expeditiously obtain documents and testimony. We had hoped to obtain requested documents quickly and, therefore, scheduled depositions in Toronto for the week of May 26-30, 2015. While they have acted cooperatively in responding to the subject discovery, all third parties have insisted in our obtaining from courts in Canada orders enforcing the Requests. We

experienced some unavoidable delays due to the need to negotiate terms and conditions of the orders of enforcement as well as the individual discovery requests themselves. We obtained the last of the needed orders on May 19, 2015. In each instance the Canadian court gave the non-parties two weeks from the date of the order to produce the documents. All the third parties are now in the process of gathering and reviewing the responsive material. However, they will not be able to produce the requested materials in time to allow counsel adequate time for review and prepare adequately for the depositions as currently scheduled. The parties believe that allowing for scheduling conflicts and other unforeseen issues that may arise, they can complete all fact discovery by June 30, and all discovery by the current deadline of July 22, 2015.

The parties further request that if the Court allows the requested modification, that it also adjourn the next scheduled pre-trial conference, now set for June 5, 2015, until July 10, 2015, when all fact discovery should be completed.

Thank you for your consideration of this request.

Respectfully submitted,

/S/ Charles D. Stodghill
Charles D. Stodghill
Counsel for Plaintiff

Cc: Jack Yoskowitz, Esq.
Counsel for Defendants

Request GRANTED. All discovery shall be complete no later than July 22, 2015. No further extensions shall be granted. The conference scheduled for June 5, 2015, is ADJOURNED to July 24, 2015, at 10:00 a.m.

SO ORDERED.



HON. VALERIE CAPRONI
UNITED STATES DISTRICT JUDGE

May 21, 2015